

FEB 13 2014

Kendrick Mueller
ConAgra Foods
554 S Yosemite Ave
Oakdale, CA 95361

RE: Final – Authority to Construct/Certificate of Conformity (Minor Mod)
Facility Number: N-1976
Project Number: N-1133192

Dear Mr. Mueller:

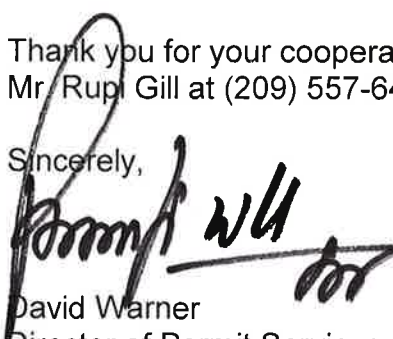
The Air Pollution Control Officer has issued the Authority to Construct permit to ConAgra Foods to replace the existing burner, install a selective catalytic reduction system, establish startup/shutdown limits for NOx and CO emissions, and establish requirements for the use of a portable analyzer monitoring scheme for boiler #4 under permit N-1976-4, at 554 S Yosemite Ave, Oakdale, California.

Enclosed are the Authority to Construct permit and invoice for the engineering evaluation fees pursuant to District Rule 3010. The District's analysis of the proposal was sent to US EPA Region IX on January 15, 2014. No comments were received following the District's preliminary decision on this project.

Prior to operating with modifications authorized by the Authority to Construct, you must submit an application to modify the Title V permit as an administrative amendment in accordance with District Rule 2520, Section 11.5.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Rupl Gill at (209) 557-6400.

Sincerely,



David Warner
Director of Permit Services
DW: JK

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

Seyed Sadredin

Executive Director / Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

Due Date

4/11/2014

Amount Due

\$ 1,079.30

Amount Enclosed

ATCFEE N1133192
1976 N102943 2/10/2014

RETURN THIS TOP PORTION ONLY, WITH REMITTANCE TO:

CONAGRA FOODS
ATTN: REGIONAL ENVIRONMENTAL MANAGER
554 S YOSEMITE AVE
OAKDALE, CA 95361

SJVAPCD
4800 Enterprise Way
Modesto, CA 95356-8718

Thank You!



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

SJVAPCD Tax ID: 77-0262563

CONAGRA FOODS
554 S YOSEMITE AVE
OAKDALE, CA 95361

Facility ID

N1976

Invoice Date

2/10/2014

Invoice Number

N102943

Invoice Type

Project: N1133192

PROJECT NUMBER: 1133192

APPLICATION FILING FEES

ENGINEERING TIME FEES

TOTAL FEES

LESS PREVIOUSLY PAID PROJECT FEES APPLIED TO THIS INVOICE

PROJECT FEES DUE (Enclosed is a detailed statement outlining the fees for each item.)

\$ 71.00

\$ 1,079.30

\$ 1,150.30

(\$ 71.00)

\$ 1,079.30

Late Payment (see Rule 3010, Section 11.0 Late Fees)

Postmarked

Total Due

After 4/11/2014 through 4/21/2014

\$ 1,187.23

After 4/21/2014

\$ 1,618.95

After 5/11/2014

Permits To Operate MAY BE SUSPENDED

San Joaquin Valley Air Pollution Control District
4800 Enterprise Way, Modesto, CA 95356-8718, (209) 557-6400, Fax (209) 557-6475

Invoice Detail

Facility ID: N1976

CONAGRA FOODS
554 S YOSEMITE AVE
OAKDALE, CA 95361

Invoice Nbr: N102943
Invoice Date: 2/10/2014
Page: 1

Application Filing Fees

Project Nbr	Permit Number	Description	Application Fee
N1133192	N-1976-4-11	MODIFICATION OF 196 MMBTU/HR BABCOCK & WILCOX MODEL FF-16 NATURAL GAS-FIRED BOILER (#4) WITH A TODD MODEL RADIANT LOW NOX BURNER AND FLUE GAS RECIRCULATION (FGR): TO REPLACE THE EXISTING BURNER WITH 196 MMBTU/HR NATCOM (OR EQUIVALENT MANUFACTURER) LOW-NOX BURNER AND INSTALL NBI/CRI (OR EQUIVALENT MANUFACTURER) SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM. THE POST-PROJECT EQUIPMENT DESCRIPTION WILL BE: 196 MMBTU/HR BABCOCK & WILCOX MODEL FF-16 NATURAL GAS-FIRED BOILER (#4) WITH A NATCOM (OR EQUIVALENT MANUFACTURER) LOW NOX BURNER WITH INDUCED FLUE GAS RECIRCULATION (FGR) SYSTEM SERVED BY A NBI/CRI (OR EQUIVALENT MANUFACTURER) SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM	\$ 71.00
Total Application Filing Fees:			\$ 71.00

Engineering Time Fees

Project Nbr	Quantity	Rate	Description	Fee
N1133192	3.7 hours	\$ 139.00 /h	After-Hours Engineering Time(OverTime)	\$ 514.30
			Less Credit For Application Filing Fees	(\$ 71.00)
			After-Hours Engineering Time(OverTime) SubTotal	\$ 443.30
N1133192	6 hours	\$ 106.00 /h	Standard Engineering Time	\$ 636.00
Total Engineering Time Fees:				\$ 1,079.30



AUTHORITY TO CONSTRUCT

PERMIT NO: N-1976-4-11

ISSUANCE DATE: 02/10/2014

LEGAL OWNER OR OPERATOR: CONAGRA FOODS
MAILING ADDRESS: ATTN: REGIONAL ENVIRONMENTAL MANAGER
554 S YOSEMITE AVE
OAKDALE, CA 95361

LOCATION: 554 S YOSEMITE AVE
OAKDALE, CA 95361

EQUIPMENT DESCRIPTION:

MODIFICATION OF 196 MMBTU/HR BABCOCK & WILCOX MODEL FF-16 NATURAL GAS-FIRED BOILER (#4) WITH A TODD MODEL RADIAN LOW NOX BURNER AND FLUE GAS RECIRCULATION (FGR): TO REPLACE THE EXISTING BURNER WITH 196 MMBTU/HR NATCOM (OR EQUIVALENT MANUFACTURER) LOW-NOX BURNER AND INSTALL NBI/CRI (OR EQUIVALENT MANUFACTURER) SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM. THE POST-PROJECT EQUIPMENT DESCRIPTION WILL BE: 196 MMBTU/HR BABCOCK & WILCOX MODEL FF-16 NATURAL GAS-FIRED BOILER (#4) WITH A NATCOM (OR EQUIVALENT MANUFACTURER) LOW NOX BURNER WITH INDUCED FLUE GAS RECIRCULATION (FGR) SYSTEM SERVED BY A NBI/CRI (OR EQUIVALENT MANUFACTURER) SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM

CONDITIONS

1. This permit cancels and replaces the Authority to Construct N-1976-4-10. [District Rule 2201] Federally Enforceable Through Title V Permit
2. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
3. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
4. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / AF/CO


DAVID WARNER, Director of Permit Services

N-1976-4-11 Feb 10 2014 5:11PM - KAW/LONJ - Joint Inspection NOT Required

6. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
7. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
8. The unit shall only be fired on PUC-quality natural gas. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
9. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the unit shall be installed, utilized and maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Heat input to this boiler shall not exceed 943,272 MMBtu in any 12 consecutive month rolling period. [District Rule 2201] Federally Enforceable Through Title V Permit
11. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
12. Duration of each startup and each shutdown shall not exceed 2.0 hours. [District Rule 4306 and 4320] Federally Enforceable Through Title V Permit
13. The total duration of startup and shutdown period shall not exceed 4.0 hours in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The total duration of startup and shutdown period shall not exceed 80 hours during any 12 consecutive month rolling period. [District Rule 2201] Federally Enforceable Through Title V Permit
15. During startup and shutdown, NO_x emissions shall not exceed 30 ppmvd @ 3% O₂ or 0.036 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
16. During startup and shutdown, CO emissions shall not exceed 100 ppmvd @ 3% O₂ or 0.074 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Except during startup and shutdown, NO_x emissions shall not exceed 5.0 ppmvd @ 3% O₂ or 0.0062 lb/MMBtu, referenced as NO₂. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
18. Except during startup and shutdown, CO emissions shall not exceed 50 ppmvd @ 3% O₂ or 0.037 lb/MMBtu. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
19. SO_x emissions shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
20. PM₁₀ emissions shall not exceed 0.005 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
21. VOC emissions shall not exceed 0.0014 lb/MMBtu, referenced as methane. [District Rule 2201] Federally Enforceable Through Title V Permit
22. NH₃ emissions from the SCR system shall not exceed 10.0 ppmvd @ 3% O₂. [District Rule 2201] Federally Enforceable Through Title V Permit
23. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
24. Source testing to measure startup and shutdown NO_x and CO emissions shall be conducted within 60 days of initial startup under this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
25. Source testing to measure steady state NO_x, CO, PM₁₀, VOC and NH₃ emissions shall be conducted within 60-days of the initial startup under this permit. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

26. Source testing to measure NO_x, CO and NH₃ emissions during steady state operation shall be conducted at least once every 12 months. After demonstrating compliance on 2 consecutive annual source tests, the unit shall be tested not less than once every 36 months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every 12 months. [District Rule 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
27. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
28. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
29. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
30. NO_x emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
31. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
32. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
33. Source testing for ammonia slip shall be conducted utilizing BAAQMD Method ST-1B. [District Rule 1081] Federally Enforceable Through Title V Permit
34. Source testing to measure PM₁₀ shall be conducted using either: EPA Method 201 or 201A, and 202; or CARB Method 5 in combination with 501. Should the applicant decided to use different methodology, the methodology must be approved by the District prior to its use. [District Rule 2201] Federally Enforceable Through Title V Permit
35. In lieu of performing a source test for PM₁₀, the results of the total particulate test may be used for compliance with the PM₁₀ emissions limit provided the results include both the filterable and condensable (back half) particulate, and that all particulate matter is assumed to be PM₁₀. Source testing to measure concentrations of total particulate emissions shall be conducted using EPA method 5. [District Rule 2201] Federally Enforceable Through Title V Permit
36. Source testing to measure VOC emissions shall be conducted using EPA Method 18 or 25A. Should the applicant decided to use different methodology, the methodology must be approved by the District prior to its use. [District Rule 2201] Federally Enforceable Through Title V Permit
37. Fuel sulfur content shall be determined using EPA Method 11 or Method 15. [District Rule 4320] Federally Enforceable Through Title V Permit
38. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
39. The permittee shall monitor and record the stack concentration of NO_x, CO, NH₃ and O₂ at least once during each month in which source testing is not performed. NO_x, CO and O₂ monitoring shall be conducted utilizing a portable analyzer that meets District specifications. NH₃ monitoring shall be conducted utilizing gas detection tubes (Dräger brand or District approved equivalent). Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless it has been performed within the last month. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

40. If either the NO_x, CO or NH₃ concentrations, as measured by the portable analyzer or the District approved ammonia monitoring equipment, exceed the permitted levels the permittee shall return the emissions to compliant levels as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer or the ammonia monitoring equipment continue to show emission limit violations after 1 hour of operation following detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation that is subject to enforcement action has occurred. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
41. All NO_x, CO, O₂ and ammonia emission readings shall be taken with the unit operating at conditions representative of normal operation or under the conditions specified in the Permit to Operate. The NO_x, CO and O₂ analyzer as well as the NH₃ emission monitoring equipment shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Analyzer readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
42. Ammonia emissions readings shall be conducted at the time the NO_x, CO and O₂ readings are taken. The readings shall be converted to ppmvd @ 3% O₂. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
43. The permittee shall maintain records of: (1) the date and time of NO_x, CO, NH₃ and O₂ measurements, (2) the O₂ concentration in percent by volume and the measured NO_x, CO and NH₃ concentrations corrected to 3% O₂, (3) make and model of the portable analyzer, (4) portable analyzer calibration records, (5) the method of determining the NH₃ emission concentration, and (6) a description of any corrective action taken to maintain the emissions at or below the acceptable levels. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
44. Permittee shall determine sulfur content of combusted gas annually or shall demonstrate that the combusted gas is provided from a PUC or FERC regulated source. [District Rules 1081 and 4320] Federally Enforceable Through Title V Permit
45. The permittee shall maintain record of the following items: (1) date; (2) duration of each startup (hours); (3) duration of each shutdown (hours); (4) total start-up and shutdown durations per day (hour/day); (5) total start-up and shutdown durations per month (hours/month); (6) total startup and shutdown duration in a 12 consecutive month period. [District Rule 2201, 4306 and 4320] Federally Enforceable Through Title V Permit
46. The permittee shall maintain records of fuel use (standard cubic feet) on monthly basis and use those records to calculate heat input rate (MMBtu) to the unit in a 12 consecutive month rolling period. [District Rule 2201] Federally Enforceable Through Title V Permit
47. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit